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September 10, 2024

**Via ECF**

Honorable George B. Daniels  
United States District Court Judge  
Honorable Sarah Netburn  
United States Magistrate Judge

Re: *In re Terrorist Attacks on September 11, 2001*,  
MDL No. 03-MDL-1570 (GBD) (SN)  
*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977  
Wrongful Death Judgments Against Defendants-in- Default

Your Honors:

I write to provide the Court with some clarification on several Amended Proposed Orders that have been filed regarding two separate motions filed on behalf of several of my clients. Since the Amended Proposed Orders have been filed at the request of the Court Clerk, I hope what follows below explains what is on file, what has been requested and the relief sought by the plaintiffs.

On June 19, 2024, a “Motion for Punitive Damages or Treble Damages, Plus Prejudgment Interest, and a Final Judgment against the Islamic Republic of Iran” (ECF#9949) was filed that requests an Order providing final and complete relief against Iran. In connection with this motion my office filed two alternative Proposed Orders (ECF#9951 and 9952). The Clerk of the Court asked my office to amend and refile the two Proposed Orders to add a column so that the Clerk might easily calculate and add an award of prejudgment interest for each plaintiff. To satisfy the Clerk, my office filed Amended Proposed Orders (ECF#10254 and 10255).

On July 3, 2024, a “Motion for Punitive Damages or Treble Damages, Plus Prejudgment Interest, and a Final Judgment against the Taliban” (ECF#10057) was filed that requests an Order providing final and complete relief against the Taliban. In connection with this motion my office filed two Proposed Order (ECF#10059 and 10060). In accordance with the Clerk’s demand, my office filed Amended Proposed Orders (ECF#10235 and 10236) to add a column to allow for prejudgment interest calculations and awards.

Please let me know if the Court has any questions about the pending motions and the Amended Proposed Orders.

Sincerely yours,

*John F. Schutty*